

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
NISHA BROOKS-WHITTINGTON
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Nisha_Brooks-Whittington@fd.org
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7 Attorney for Victor Ramone Wright

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 VICTOR RAMONE WRIGHT,
15 Defendant.
16

Case No. 2:21-cr-00024-APG-DJA

**STIPULATION FOR EXTENSION
OF TIME TO FILE
SUPPLEMENTAL BRIEFING**
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, and
19 Rene L. Valladares, Federal Public Defender, and Nisha Brooks-Whittington, Assistant Federal
20 Public Defender, counsel for Victor Ramone Wright, that the previously ordered deadline for
21 filing of supplemental briefing be vacated and that the parties herein shall have to and including
22 June 21, 2023.

23 The Stipulation is entered into for the following reasons:

24 1. On March 30, 2023, this Court held an evidentiary hearing on Mr. Wright's
25 Motion to Suppress. ECF No. 72. At the conclusion of the hearing, the parties were ordered to
26 file supplemental briefing two weeks after the evidentiary hearing transcript is filed. ECF No.

72. The evidentiary hearing transcript was filed on May 24, 2023. ECF No. 79. Defense counsel will be out of the jurisdiction from May 29, 2023, through June 3, 2023. As a result, defense counsel needs additional time to review the transcript, research the issues raised by this Court, and prepare the supplemental briefing.

2. The defendant is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to review the evidentiary hearing transcript and prepare the supplemental briefing.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

This is the first stipulation to continue filed herein.

DATED this 25th day of May 2023.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Nisha Brooks-Whittington
NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

By /s/ Daniel J. Cowhig
DANIEL J. COWHIG
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

VICTOR RAMONE WRIGHT,

Defendant.

Case No. 2:21-cr-00024-APG-DJA

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

FINDINGS OF FACT, CONCLUSIONS OF LAW

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. On March 30, 2023, this Court held an evidentiary hearing on Mr. Wright's Motion to Suppress. ECF No. 72. At the conclusion of the hearing, the parties were ordered to file supplemental briefing two weeks after the evidentiary hearing transcript is filed. ECF No. 72. The evidentiary hearing transcript was filed on May 24, 2023. ECF No. 79. Defense counsel will be out of the jurisdiction from May 29, 2023, through June 3, 2023. As a result, defense counsel needs additional time to review the transcript, research the issues raised by this Court, and prepare the supplemental briefing.

2. The defendant is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to discuss the proposed resolution with her client.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including June 21, 2023, within which to file the supplemental briefing.

DATED this 25th day of May 2023.



UNITED STATES MAGISTRATE JUDGE